

07 CV 3715

AMY J. GREER
KINGDON KASE
TAMI S. STARK (TS-8321)
COLLEEN K. LYNCH
Attorneys for Plaintiff
SECURITIES AND EXCHANGE COMMISSION
Philadelphia Regional Office
701 Market Street
Suite 2000
Philadelphia, PA 19103
Telephone: (215) 597-3100
Telefax: (215) 597-2740

Judge Hellerstein

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

JENNIFER XUJIA WANG, and
RUBEN a/k/a RUOPIAN CHEN,

Defendants,

and

ZHILING FENG,

Relief Defendant.

Civil Action No.

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S
EX PARTE APPLICATION FOR A TEMPORARY RESTRAINING ORDER,
PRELIMINARY INJUNCTION, AND ORDER
FREEZING ASSETS AND GRANTING OTHER RELIEF**

Plaintiff Securities and Exchange Commission ("Commission") hereby applies *ex parte* for an order (i) freezing the assets of defendants Jennifer Xujia Wang and Ruben

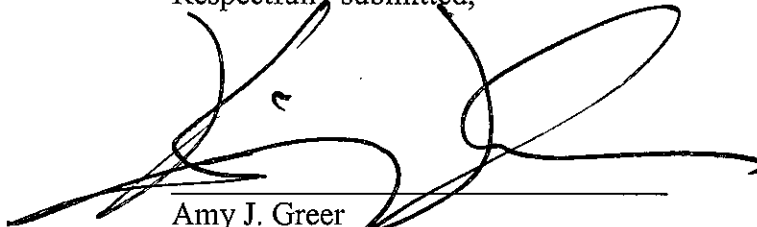
a/k/a Ruopian Chen (collectively, "Defendants"), and relief defendant Zhiling Feng ("Feng"); (ii) temporarily restraining Defendants from violating Section 10(b) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. § 78j(b), and Rule 10b-5 thereunder, 17 C.F.R. § 240.10b-5; (iii) preliminarily enjoining Defendants from future violations of the respective provisions of the securities laws mentioned above; (iv) preventing destruction of evidence; (v) requiring Defendants and relief defendant Feng to repatriate funds transferred to overseas accounts and to deposit such funds into the Registry of the Court; and (vi) providing for alternative means of notifying Defendants and relief defendant Feng of these proceedings and serving them with process.

In support of this Application, the Commission has filed its Complaint, a memorandum of law, and the Declaration of Daniel L. Koster.

The undersigned counsel certifies, in the attached Declaration pursuant to Rules 6 and 65(b) of the Federal Rules of Civil Procedure, that the assets which are the subject of this action are in jeopardy of being dissipated and that, as to Defendants Chen and Wang, there exists a risk of flight from the jurisdiction. Therefore, no advance written notice

was given to the Defendants or relief defendant Feng prior to the filing of this Application and the accompanying papers with the Court.

Respectfully submitted,

A large, stylized handwritten signature in black ink, likely belonging to Amy J. Greer, is written over a horizontal line.

Amy J. Greer
Kingdon Kase
Tami S. Stark
Colleen K. Lynch
Attorneys for Plaintiff:

SECURITIES AND EXCHANGE
COMMISSION
Mellon Independence Center
701 Market Street, Suite 2000
Philadelphia, PA 19106
(215) 597-3100

DATED: May 10, 2007